Brooks, Laura

From:

Sent:

To: Cc:

Brooks, Laura
Wednesday, March 23, 2005 1:29 PM
Steve Gunderson; 'aguilar.mark@epamail.epa.gov'; Legare, Joe; Shelton, Dave Walstrom, Jan; Sattelberg, Mark; Surovchak, Scott; Rampe, John draft response to N&E Air Contamination SR comments

Subject:

NE Air SR Response

to Comments...

Attached are draft responses to the N&E Air Contamination Summary Report comments. Scott Surovchak and John Rampe have reviewed them. If these responses are ok, then I will incorporate them into the text and consider the document complete for now. If John has already forwarded to you, please disregard this message. Thanks, LMB



ADMIN RECORD

Comment Response 2/24/05 CDPHE (No comments) and 3/9/05 EPA Comments on 1/31/05 Draft Nature and Extent of Air Contamination Summary Report

No	Comment	Comment	Response
	From	State Section 1	
1	EPA	In the second full paragraph of pg. 2, the report should explain (if possible), why the off-site dose rate (shown in Figure 1) is highest in years 2003 and 2004. This may be due to the extensive clean-up operations in those years.	The following sentence will be added to the paragraph: "Although the off-site dose rate is highest in year 2003, while substantial cleanup efforts were occurring at RFETS, the elevated dose does not appear to be related to RFETS activities. Instead, the sampler at which the elevated dose rate occurred is located north of the site, adjacent to a dirt road that saw increased levels of traffic due to residential and commercial development in the area. The traffic stirred up dust containing naturally occurring uranium isotopes, which drove up ambient
			concentrations measure by the sampling device." Also note that the figure in the review draft only showed a partial year of 2004 data. The complete 2004 data set is now available and the resulting annual dose rate has dropped to 1.56% of the standard, well below the 2003 level. The complete draft RI/FS Report will contain a figure with the latest data.
2	EPA	For clarification, please add the red word as follows: on page 2, 3 rd complete paragraph, "For example, a 7-year record of radionuclide concentrations shows annual average dose rates three orders of magnitude below the 40 CFR 61, Subpart H, 10-mrem benchmark,	Clarification will be made.

Brooks, Laura

From: Sent:

Aguilar.Mark@epamail.epa.gov Tuesday, March 08, 2005 12:23 PM

To:

Brooks, Laura

Subject:

Fw: Nature and Extent Comments

Laura, I think you email is correct now. Sorry about that.

C. Mark Aguilar Project Manager, Rocky Flats 303.312.6251

---- Forwarded by Mark Aguilar/EPR/R8/USEPA/US on 03/08/2005 12:22 PM

Mark

Aguilar/EPR/R8/U

SEPA/US

To

Laura Brooks

03/08/2005 12:18 PM CC

joe.legare@rf.doe.gov, steve.gunderson@state.co.us,

dave.shelton@rfets.gov

Subject

Nature and Extent Comments

Laura, according to Robert Edger this is a good summary report, if you could make the following changes we can put this document on the shelf.

In the second full paragraph of pg. 2, the report should explain (if possible), why the off-site dose rate (shown in Figure 1) is highest in years 2003 and 2004. This may be due to the extensive clean-up operations in those years.

For clarification, please add the red word as follows: on page 2, 3rd complete paragraph,"For example, a 7-year record of radionuclide concentrations... shows annual average dose rates three orders of magnitude below the 40 CFR 61, Subpart H, 10-mrem benchmark,

C. Mark Aguilar Project Manager, Rocky Flats 303.312.6251



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

999 18TH STREET- SUITE 300 DENVER, CO 80202-2466 Phone 800-227-8917 http://www.epa.gov/region08 MAR - 9 2005

Ref: 8EPR-F

Mr. Joseph Legare Director, Project Management Division U.S. Department of Energy, Rocky Flats Project Office 10808 Highway 93, Unit A Golden, CO 80403-8200

RE: Draft Nature and Extent of Air Contamination Summary Report

Dear Mr. Legare,

EPA has completed the review of the Draft Nature and Extent of Air Contamination Summary Report, dated January 31, 2005. Over all, the document is a very good summary report. However, we have the following comments.

- 1. In the second full paragraph of pg. 2, the report should explain; why the off-site dose rate (shown in Figure 1) is highest in years 2003 and 2004.
- 2. For clarification, please add the red word as follows: on page 2, 3rd complete paragraph,"for example, a 7-year record of radionuclide concentrations... shows annual average dose rates three orders of magnitude below the 40 CFR 61, Subpart H, 10-mrem benchmark,

If you have any questions concerning these comments, please contact Robert Edger at 303-312-6669 or me at 303-312-6251.

Sincerely.

. Mark Aguilar

Rocky Flats Project Manager Environmental Protection Agency

Brooks, Laura

From: Sent:

Steve Gunderson

nt: Thursday, February 24, 2005 8:37 AM

To:

Rampe, John; Brooks, Laura

Subject:

Re: Fwd: Draft N&E Air Contamination Summary Report

>>> "Tony Harrison" <Tony.Harrison@state.co.us> 02/24/05 07:40AM >>> I did read it, and had no comments.

>>> "STEVE Gunderson" <steve.gunderson@state.co.us> 02/23/05 08:11AM >>>

Thanks David. I was just asked about the status of our review of this report by the Site yesterday, and I'm forwarding your email message to them. I also reviewed the document and did not have any comments.

Tony/Arch: Have you had an opportunity to look at this thing?

>>> David Kruchek 02/18/05 10:50AM >>>

Having looked this over, I have no comments or suggested changes. I agree that once the buildings are demolished there will be no future concerns for Beryllium releases. That is based on not having a major large amount of Be dust released during D&D operations, which is extremely unlikely based on the PDSR results. Once Be dust gets into the environment it appears to disseminate into the soil and is not re-suspendable in amounts that would be a concern. That is, it will not be above the EPA limit of 0.01 ug/m3. Only if a pile of Be dust was

released could this be a future concern. However, during building demolition (specifically B444) a significant release of Be could occur.

which is why we are monitoring to show that this has not occurred.

even if it did, it is unlikely to become a future environmental problem

after demolition.

Other than Be issues (none), the only issues are as stated in this report. The major one being radioactive (transuranic) concerns. And although not specifically stated, I would think the major concern would

be a range fire over the former IA and eastern area where the surface contamination is the highest, and releases to the air the greatest potential after a fire. Especially for anyone fighting the fire or in the immediate downwind area. Other concerns, other than a fire, which would strip off the protective soil cover, might be through reworking the soil by man or animals.

>>> STEVE Gunderson 02/09/05 01:56PM >>>

David: This is a prelim draft section of the RF/FS report, which I've asked Arch Crouse and Tony Harrison to review. In my own review of the

draft, I noticed a rather significant section on Be. Would you look at

that section (and any other part of the draft as you see fit) and provide any comments to me on it? Thanks.